

1 Sarah E. Piepmeier, Bar No. 227094
SPiepmeier@perkinscoie.com
2 Elise Edlin, Bar No. 293756
EEdlin@perkinscoie.com
3 PERKINS COIE LLP
505 Howard Street, Suite 1000
4 San Francisco, California 94105
Telephone: +1.415.344.7000
5 Facsimile: +1.415.344.7050

6 Janice L. Ta (admitted *pro hac vice*)
JTa@perkinscoie.com
7 PERKINS COIE LLP
405 Colorado Street Suite 1700
8 Austin, Texas 78701
Telephone: +1.737.256.6100
9 Facsimile: +1.737.256.6300

10 *Attorneys for Defendant*
11 *NETFLIX, INC.*

12 **UNITED STATES DISTRICT COURT**
13
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

15 LAURI VALJAKKA,
16 *Plaintiff,*
17 v.
18 NETFLIX, INC.,
19 *Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF SARAH PIEPMEIER
IN SUPPORT OF DEFENDANT
NETFLIX, INC.'S SUPPLEMENTAL
BRIEF REGARDING EXPENSES AND
FEES PURSUANT TO ECF NO. 324**

Judge: Hon. Jon S. Tigar

1 I, Sarah Piepmeier, hereby declare:

2 1. I am an attorney with the law firm Perkins Coie LLP, based in San Francisco,
3 California, and I am lead counsel representing Defendant Netflix, Inc. (“Netflix”) in the above-
4 captioned matter. I have personal knowledge of the facts set forth in this declaration and am
5 competent to testify.

6 2. In response to ECF No. 324, Netflix seeks a fee award of \$95,000. Netflix’s actual
7 fees and expenses resulting from Mr. Ramey’s violations of the Protective Order are much greater,
8 as set forth below and in the exhibits referenced herein. However, to be conservative and
9 cooperative, Netflix seeks only this portion of its total expenses and fees incurred.

10 3. Attached as Exhibit 1 is a true and correct copy of Perkins Coie’s invoices to Netflix
11 for this matter since December 2024 (when Netflix’s counsel discovered Mr. Ramey’s breach). We
12 have redacted these invoices to omit information (such as attorney and paralegal time billed to
13 tasks) unrelated to Netflix’s response to and remediation of Mr. Ramey’s violations of the
14 Protective Order.

15 4. Attached as Exhibit 2 is a summary I prepared based on the draft Perkins Coie
16 invoice for attorney time and other expenses incurred in August 2025 that have not yet been
17 invoiced to Netflix. We have redacted these draft invoices to omit information (such as attorney
18 and paralegal time billed to tasks) unrelated to Netflix’s response to and remediation of Mr.
19 Ramey’s violations of the Protective Order. Upon request, I am willing to provide a true and correct
20 copy of this invoice reflecting these fees and expenses after Perkins Coie submits it to Netflix,
21 redacted to omit attorney and paralegal time billed to tasks unrelated to Netflix’s response to and
22 remediation of Mr. Ramey’s violations of the Protective Order.

23 5. Below are the qualifications of the Perkins Coie timekeepers who provided services
24 to Netflix in response to and remediation of Mr. Ramey’s violations of the Protective Order. I also
25 provide the billing rates for each timekeeper and the prevailing rates for intellectual property
26 attorneys in the San Francisco Bay Area. Netflix, a sophisticated client, has endorsed these
27 qualifications and billing rates through its selection of counsel.

1 6. I received a Bachelor of Arts Degree from Wellesley College, *cum laude*, in 1996.
2 I received my J.D. from New York University School of Law in 2003, where I was an Editor on
3 the Annual Survey of American Law. Since 2003, I have practiced as an intellectual property
4 litigator (with a focus on patent litigation) around the country, but I have been based in San
5 Francisco since 2003. I have been a partner since 2011 (first at Kirkland & Ellis, and now at Perkins
6 Coie) and am currently a member of the Executive Committee of Perkins Coie. I have received
7 various legal awards over the past twenty years, including California Lawyer of the Year (in 2019)
8 and an individual ranking in Chambers for the past several years. For many years, I have been
9 fortunate to have a broad base of clients, chiefly in the tech space, who routinely retain me as lead
10 trial counsel in large intellectual property litigation matters.

11 7. During the period relevant to Netflix's fee request (December 2024 through August
12 2025), my billed rate for this matter was [REDACTED] per hour, which is [REDACTED]
13 [REDACTED]. I am informed and
14 believe that this rate is reasonable and customary for an attorney of my experience and caliber
15 practicing in the San Francisco Bay Area. According to an AIPLA 2023 survey, the first quartile
16 and third quartile average hourly billing rates in 2022 for an intellectual property partner in the San
17 Francisco Bay Area were \$534 and \$1,546, respectively. *See* Exhibit 3, which is a true and correct
18 copy of that AIPLA 2023 survey. My rate billed to Netflix in this matter is within this range,
19 despite the survey reporting rates from several years earlier. In addition, the first quartile and third
20 quartile average hourly billing rate in 2022 for an intellectual property partner in firms with more
21 than 150 full-time intellectual property lawyers and agents, like Perkins Coie, were \$768 and
22 \$1,313, respectively. My rate billed to Netflix in this matter is also within this range, despite the
23 survey reporting rates from several years earlier.

24 8. Elise Edlin received a Bachelor of Science Degree in Biological Science from the
25 University of California, Santa Barbara in 2000. She received her J.D. from the University of
26 California, Berkeley School of Law in 2013. For more than a decade, she has practiced as an
27 intellectual property litigator (with a focus on patent litigation) in the greater San Francisco Bay
28 Area. She was elevated to partner at Perkins Coie in 2023.

1 9. During the period relevant to Netflix's fee request, Ms. Edlin's billed rate for this
2 matter was [REDACTED] per hour, which is [REDACTED]
3 [REDACTED]. I am informed and believe that this rate is reasonable
4 and customary for an attorney of her experience and caliber practicing in the San Francisco Bay
5 Area. In view of the AIPLA 2023 survey results discussed above in paragraph 7, Ms. Edlin's rate
6 billed to Netflix in this matter is within the first and third quartile average hourly billing rates for
7 an intellectual property lawyer in the San Francisco Bay Area, and is also within the first and third
8 quartile average hourly billing rate for an intellectual property partner in firms with more than 150
9 full time intellectual property lawyers and agents, despite the survey reporting rates from several
10 years earlier.

11 10. Adam Hester is a partner-track associate at Perkins Coie. Mr. Hester received a
12 Bachelor of Science Degree, Major in Physics, from Creighton University, *summa cum laude*, in
13 2012. Mr. Hester received his J.D. from the University of Michigan Law School, *cum laude*, in
14 2016. Since 2016, Mr. Hester has practiced as an intellectual property litigator (with a focus on
15 patent litigation), including in the greater San Francisco Bay Area (2016-2021). Mr. Hester is now
16 based out of Perkins Coie's Madison, Wisconsin office, but he maintains a national practice. Mr.
17 Hester has represented numerous patent owners and accused infringers in District Court cases from
18 major patent venues such as the Northern and Central Districts of California, the Eastern and
19 Western Districts of Texas, and the District of Delaware, as well as in other fora (the U.S. Patent
20 and Trademark Office's Patent Trial and Appeal Board and the International Chamber of
21 Commerce Arbitration).

22 11. During the period relevant to Netflix's fee request, Mr. Hester's billed rate for this
23 matter was [REDACTED] per hour, which is [REDACTED]
24 [REDACTED]. I am informed and believe that this rate is reasonable
25 and customary for an attorney of Mr. Hester's experience and caliber practicing in the San
26 Francisco Bay Area. According to an AIPLA 2023 survey, the first quartile and third quartile
27 average hourly billing rates in 2022 for an intellectual property partner-track attorney in the "Other
28

1 West” region were \$680 and \$1,266, respectively. *See* Exhibit 3. Mr. Hester’s rate billed to Netflix
2 in this matter is within this range, despite the survey reporting rates from several years earlier.

3 12. Perkins Coie staff member Kate Rose also participated in this matter. Ms. Rose is
4 identified on Perkins Coie’s invoices to Netflix as “K. Smith” due to a name change.

5 13. Ms. Rose is a skilled senior paralegal. Ms. Rose received her Paralegal Certificate
6 from the University of California, Berkeley, *with Distinction*, in 2016. Since starting her career in
7 1999, Ms. Rose has worked at large law firms in their intellectual property litigation departments,
8 with a focus on patent litigation. During the period relevant to Netflix’s fee request (December
9 2024 through September 2025), Ms. Rose’s billed rate for this matter was [REDACTED]. Ms.
10 Rose’s rate charged to Netflix is consistent with rates that Perkins Coie charges other clients for
11 paralegals of Ms. Rose’s experience, skill, and expertise.

12 14. I am familiar with the procedures used by Perkins Coie attorneys and staff members
13 in maintaining their time. Attorneys and staff members typically record, in tenths of an hour, the
14 time spent on specific tasks for their work that day.

15 15. The work performed by Ms. Edlin, Mr. Hester, Ms. Rose, and me in response to Mr.
16 Ramey’s violations of the Protective Order is described on the invoices in Exhibit 1 and the
17 summary of time to be invoiced to Netflix in Exhibit 2. Each of us performed other work on this
18 matter since December 2024, but that work has been redacted to protect confidentiality and
19 attorney-client privilege.

20 16. Baker Botts LLP also represents Netflix in this matter. Baker Botts attorneys
21 incurred fees and costs related to Netflix’s response to and remediation of Mr. Ramey’s violations
22 of the Protective Order. Netflix is also submitting a declaration from Rachael Lamkin that includes
23 Baker Botts’s invoices and summarizing the qualifications of the Baker Botts timekeepers who
24 provided service to Netflix in response to and remediation of Mr. Ramey’s violations of the
25 Protective Order. The requested total fee award set forth in paragraph 3 above is further justified
26 in view of the fees and expenses incurred by Baker Botts set forth in Ms. Lamkin’s declaration and
27 associated exhibits.

17. The table below summarizes the total work performed by attorneys and paralegals at Perkins Coie and Baker Botts related to Mr. Ramey's violations of the protective order. The information contained below is reflected in the invoices and draft invoices/summaries of time to be billed submitted with this declaration and in the Declaration of Rachael Lamkin. Again, Netflix only seeks a fee award of \$95,000 but provides the below table to confirm for the Court that the amount of fees Netflix actually incurred is significantly greater.

Attorney/Paralegal	Firm	Total Hours Billed	Rate Charged to Netflix	Total Fees
Sarah Piepmeier	Perkins Coie			
Elise Edlin	Perkins Coie			
Adam Hester	Perkins Coie			
Kate Rose (Smith)	Perkins Coie			
R. Lamkin	Baker Botts			
L. Dreyer	Baker Botts			
A. House	Baker Botts			
T. Carter	Baker Botts			
J. Berger	Baker Botts			
K. Gill	Baker Botts			
G. Tolle	Baker Botts			
L Nemiroff	Baker Botts			

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed on September 2, 2025 in San Francisco, California.

/s/ Sarah Piepmeier
Sarah Piepmeier